

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 08-80064-CR-MARRA/VITUNAC(s)

18 U.S.C. § 1343

18 U.S.C. § 981

21 U.S.C. § 853

26 U.S.C. § 7206(1)

18 U.S.C. § 2

UNITED STATES OF AMERICA,

Plaintiff,

v.

**AMAL RAMPADARUTH and
JADOOMANEE RAMPADARUTH,
a.k.a. “Dutt” Rampadaruth,**

Defendants.

_____ /

SUPERSEDING INFORMATION

The United States Attorney charges that:

INTRODUCTION

At all times material to this Superseding Information:

1. Defendant **AMAL RAMPADARUTH** was the president, director, and chief executive officer of ALPS RESOURCES BANKERS, INC. (“*ALPS*”) and AMALGAMATED RESOURCES HOLDINGS, INC. (“*ARH*”).
2. Defendant **JADOOMANEE RAMPADARUTH**, also known as “**Dutt**” Rampadaruth, was the chief financial officer and secretary of ALPS and the chairman and chief financial officer of ARH.

3. Defendant **JADOOMANEE RAMPADARUTH** was the father of defendant **AMAL RAMPADARUTH**.
4. ALPS and ARH were Florida corporations that claimed to operate in the financial services industry.
5. Defendants **AMAL RAMPADARUTH** and **JADOOMANEE RAMPADARUTH** offered what they claimed were various financial products, including alleged “bank guarantees,” through ALPS and ARH. They claimed the alleged “bank guarantees,” purportedly from foreign financial institutions, could be used by purchasers as collateral to obtain substantial loans from domestic financial institutions, and as assurance to domestic lenders that any financing granted would be repaid if any default on such loans should occur.
6. Victim N.P., a person known to the United States Attorney, attempted to purchase an alleged “bank guarantee” from defendants **AMAL RAMPADARUTH** and **JADOOMANEE RAMPADARUTH** through ALPS and ARH.

COUNTS ONE AND TWO
WIRE FRAUD (18 U.S.C. §1343)

7. The allegations contained within paragraphs one through six are realleged and incorporated herein by reference.
8. From in or around January 2005, and continuing through the date of this indictment, the exact dates being unknown to the grand jury, in Palm Beach County, in the Southern District of Florida and elsewhere, the defendants,

AMAL RAMPADARUTH, and
JADOOMANEE RAMPADARUTH, a.k.a. “DUTT” RAMPADARUTH

and others known and unknown to the grand jury, did knowingly and with an intent to defraud, devise and intend to devise a scheme and artifice to defraud and for obtaining money by means of material false and fraudulent pretenses, representations and promises, well knowing that the pretenses, representations and promises would be and were false and fraudulent when made, and did aid and abet therein.

OBJECT OF THE SCHEME AND ARTIFICE TO DEFRAUD

9. The object of the scheme and artifice to defraud was for defendants **AMAL RAMPADARUTH** and **JADOOMANEE RAMPADARUTH** to unlawfully enrich themselves and others by causing Victim N.P. to send substantial sums of money via wire transfer to ALPS based on material false and fraudulent pretenses, representations and promises regarding Victim N.P.'s attempted purchase of an alleged "bank guarantee" through ALPS and ARH.

MANNER AND MEANS OF THE SCHEME AND ARTIFICE TO DEFRAUD

It was part of the scheme and artifice to defraud that:

10. Defendants **AMAL RAMPADARUTH** and **JADOOMANEE RAMPADARUTH** maintained a website for ALPS and ARH, www.alpsbankers.com, on which they advertised their alleged financial services and provided contact information for prospective clients.
11. Defendants **AMAL RAMPADARUTH** and **JADOOMANEE RAMPADARUTH** falsely represented and caused to be falsely represented to Victim N.P. and others associated with Victim N.P. that they could provide to Victim N.P. what they claimed was a "bank guarantee" from a foreign financial institution that Victim N.P. could use as

collateral for a substantial loan from his domestic lender in order to obtain financing for a multi-million dollar project.

12. Defendants **AMAL RAMPADARUTH** and **JADOOMANEE RAMPADARUTH** required Victim N.P. to pay a \$50,000 “commitment fee” upon entering into an agreement to purchase an alleged “bank guarantee.” Defendants **AMAL RAMPADARUTH** and **JADOOMANEE RAMPADARUTH** advised Victim N.P. and others associated with Victim N.P. that the purpose of the “commitment fee” was to provide funds for due diligence and other costs associated with the purchase of the alleged “bank guarantee.”
13. Defendants **AMAL RAMPADARUTH** and **JADOOMANEE RAMPADARUTH** later required Victim N.P. to pay an additional \$250,000 purchase price for the alleged “bank guarantee” when they claimed the alleged “bank guarantee” was almost ready to be delivered to Victim N.P.’s domestic lender.
14. Defendants **AMAL RAMPADARUTH** and **JADOOMANEE RAMPADARUTH** never delivered the alleged “bank guarantee” to Victim N.P.’s domestic lender despite Victim N.P. paying all monies requested.
15. Defendants **AMAL RAMPADARUTH** and **JADOOMANEE RAMPADARUTH** were contacted numerous times by Victim N.P. and others associated with Victim N.P. requesting a refund of the monies that Victim N.P. had paid to purchase the alleged “bank guarantee,” but defendants **AMAL RAMPADARUTH** and **JADOOMANEE RAMPADARUTH** refused to refund Victim N.P.’s monies.

USE OF WIRE COMMUNICATIONS

16. The allegations contained within paragraphs one through fifteen are realleged and incorporated herein by reference.
17. On or about the dates enumerated as to each count below, in Palm Beach County, in the Southern District of Florida, and elsewhere, for the purpose of executing the aforesaid scheme and artifice to defraud and for obtaining money and property by means of material false and fraudulent pretenses, representations and promises, the defendants,

**AMAL RAMPADARUTH, and
JADOOMANEE RAMPADARUTH, a.k.a. "DUTT" RAMPADARUTH**

and others known and unknown to the grand jury, did knowingly transmit and cause to be transmitted, by means of wire communications in interstate commerce, certain writings, signs, signals, pictures, and sounds, on or about the dates enumerated as to each count below:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF WIRE COMMUNICATION</u>
1	July 7, 2005	\$50,000 wire transfer from an account associated with Victim N.P. at Citibank, N.A., in New York, to Bank of America Account No. -----6318, in Florida, for the benefit of "Alps Resources Bankers, Inc. Legal Dept."
2	August 3, 2005	\$250,000 wire transfer from an account associated with Victim N.P. at Citibank, N.A., in New York, to Bank of America Account No. -----6318, in Florida, for the benefit of "Alps Resources Bankers, Inc. Legal Dept."

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT THREE
FILING A FALSE TAX RETURN (26 U.S.C. §7206(1))

18. The allegations contained within paragraphs one through six are realleged and incorporated herein by reference.
19. On or about April 15, 2007, in Palm Beach County, in the Southern District of Florida and elsewhere, the defendant,

JADOOMANEE RAMPADARUTH, a.k.a. “DUTT” RAMPADARUTH

a resident of Palm Beach, Florida, did willfully make and subscribe a joint United States Individual Income Tax Return, for the calendar year 2006, which was verified by a written declaration that it was made under the penalties of perjury and was filed with a Representative of the District Director of the Internal Revenue Service for the Internal Revenue District of South Florida, at West Palm Beach, Florida, which said 2006 return he did not believe to be true and correct as to every material matter in that :

- 1) the return failed to disclose that he was engaged in the operation of a business activity from which he derived gross receipts or sales and received income, namely, ALPS and ARH whereas, as he then and there well knew and believed, he was required by law and regulation to disclose the operation of this business activity, the gross receipts or sales he derived therefrom, and the income from the business activity.; and

- 2) the return reported “Wages, Salaries, Tips, Etc.” of \$45,300 whereas, as he then and there well knew and believed, he received additional wages, salaries, tips, etc. in addition to the amount stated on the return.

All in violation of Title 26, United States Code, Sections 7206(1) and Title 18, United States Code, Section 2.

CRIMINAL FORFEITURE

Upon conviction of the violations alleged in Counts One and Two of this Indictment, the defendants,

**AMAL RAMPADARUTH, and
JADOOMANEE RAMPADARUTH, a.k.a. “DUTT” RAMPADARUTH**

shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the violations, including but not limited to at least, the sum of \$300,000.00 in United States currency.

All pursuant to Title 28, United States Code, Section 2461, Title 18, United States Code, Section 981(a)(1)(C), and Title 21, United States Code, Section 853.

If the property described above as being subject to forfeiture, as a result of any act or omission of the defendants **AMAL RAMPADARUTH and JADOOMANEE RAMPADARUTH,**

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the defendants **AMAL**

RAMPADARUTH and **JADOOMANEE RAMPADARUTH**, up to the value of the above forfeitable property.

All pursuant to Title 28, United States Code, Section 2461, Title 18, United States Code, Section 981(a)(1)(C), and Title 21, United States Code, Section 853.

R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY

CAROLYN BELL
ASSISTANT UNITED STATES ATTORNEY

TRACY L. GOSTYLA
TRIAL ATTORNEY
UNITED STATES DEPARTMENT OF JUSTICE